

# BORRELLI & ASSOCIATES

P.L.L.C.

www.employmentlawyernewyork.com

655 Third Avenue  
Suite 1821  
New York, NY 10017  
Tel. No. 212.679.5000  
Fax No. 212.679.5005

910 Franklin Avenue  
Suite 200  
Garden City, NY 11530  
Tel. No. 516.248.5550  
Fax No. 516.248.6027

March 11, 2020

Via ECF and First-Class Mail

The Honorable Eric N. Vitaliano  
United States District Judge for the  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

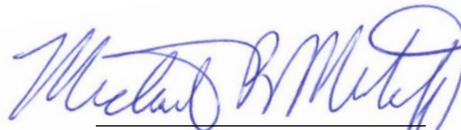
Re: Marin, et al., v. Apple-Metro, Inc., et al., Case No: 12-cv-5274 (ENV)(CLP), and  
Dove, et al., v. Apple-Metro, Inc., et al. Case No: 13-cv-1417 (ENV)(CLP)

Dear Judge Vitaliano:

Along with our co-counsel, we represent Plaintiffs and the putative classes in the above-referenced cases. We write pursuant to Rule I.I of Your Honor's Individual Motion Practice and Rules to notify the Court that the parties have reached an agreement in principle to resolve all claims in these matters on a class-wide basis, and that we are now preparing a written settlement agreement and all supporting documents. As a result, we jointly and respectfully request that the Court stay these matters pending receipt of our anticipated motion for preliminary approval of a Rule 23 class action settlement, to be filed as soon as is practicable.

We thank the Court for its time and attention to these matters.

Respectfully submitted,



Michael R. Minkoff, Esq.

*For the Firm*

C: Counsel of Record (via ECF)